

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NAV-TV, CORP.,

Plaintiff,

v.

**AUDIONICS SYSTEM, INC. D/B/A
CRUX INTERFACING SOLUTIONS,**

Defendant.

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C. A. No. 2:15-cv-01467-JRG-RSP

Jury Trial Demanded

**DECLARATION OF TIMOTHY J.H. CRADDOCK IN SUPPORT OF DEFENDANT’S
MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(A)**

I, Timothy J.H. Craddock, declare as follows:

1. I am an associate at the law firm of Buether, Joe & Carpenter, LLC. I am a member in good standing with the Texas State Bar. Unless otherwise stated, I have personal knowledge of the facts contained in this declaration and, if called as a witness, I am competent to testify to these facts.

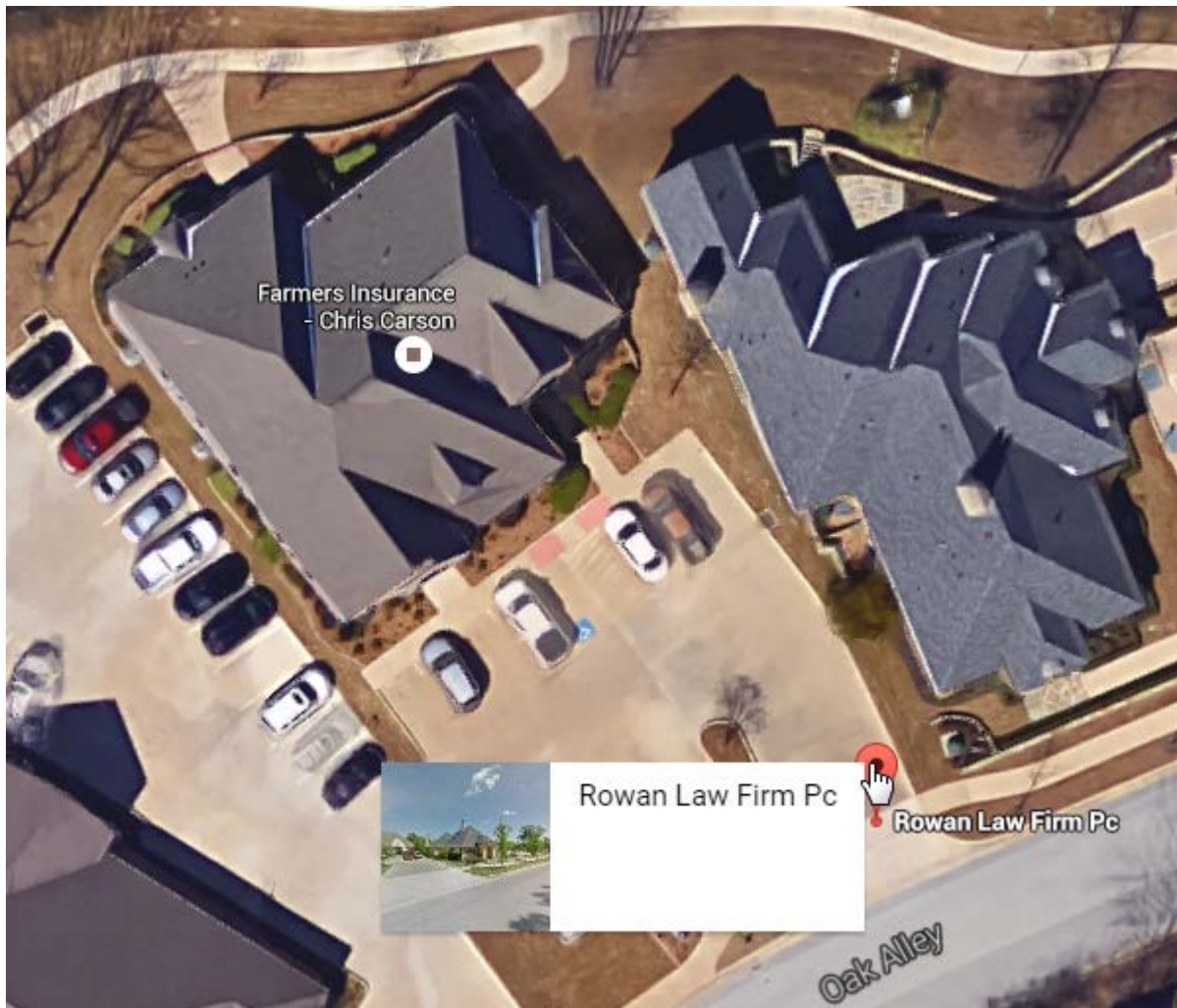
2. Attached hereto as Exhibit 1 is a true and correct copy of the search results from a Corporation Search for NAV-TV, Corp. (“NAV-TV”) using the Florida Department of State Division of Corporation’s website (<http://search.sunbiz.org/Inquiry/CorporationSearch/ByName>) performed on my behalf on December 7, 2015.

3. Exhibit 1 shows NAV-TV’s Principal Address as 3950 NW 120th Avenue, Coral Springs, Florida 33065 (“NAV-TV’s Headquarters”).

4. Attached hereto as Exhibit 2 is a true and correct copy of the results from a Taxable Entity Search for NAV-TV using the Texas Comptroller of Public Account's website (<https://mycpa.cpa.state.tx.us/coa/Index.html>) performed by me on December 7, 2015.

5. Exhibit 2 lists both a "Mailing Address" and "Registered Office Street Address" as "2325 Oak Alley, Tyler, TX 75703."

6. On December 7, 2015, I performed a Google Maps search utilizing <http://maps.google.com> for "2325 Oak Alley, Tyler, TX 75703." After running this search, I captured the following screenshot:



7. Upon information and belief, the address listed in ¶ 5 above is an address for the Rowan Law Firm, PC.

8. The named inventor for both U.S. Patent Nos. 7,917,261 (the “`261 Patent”) and 8,103,407 (the “`407 Patent”) is Emanuel Melman. Dkt No. 1, Exhibits A (the `261 Patent) and B (the `407 Patent). Both Patents indicate that the named inventor resides in Boca Raton, Florida. *Id.*

9. The prosecuting attorney for both the `261 and `407 Patents is Jennifer Meredith of the law firm Meredith & Keyhani, PLLC. Dkt No. 1, Exhibits A (the `261 Patent) and B (the `407 Patent).

10. Meredith & Keyhani, PLLC, represent NAV-TV in this case. Dkt No. 1 at 6.

11. Upon information and belief, the website located at <http://meredithkeyhani.com/> is Meredith & Keyhani, PLLC’s website (the “M&K Website”).

12. On December 7, 2015, I personally visited the M&K Website. Upon information and belief, Jennifer Meredith works in or near New York, New York. See http://meredithkeyhani.com/attorneys/jennifer_meredith-intellectual_property_lawyer.html.

13. Upon information and belief, the website located at <https://navtv.com/> is the Plaintiff’s website (“NAV-TV’s Website”).

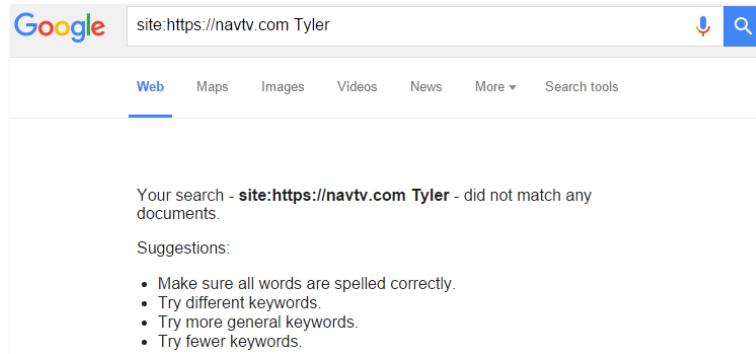
14. On December 7, 2015, I personally visited NAV-TV’s Website at <https://navtv.com/terms/> and captured the following screenshot:

Contact Us

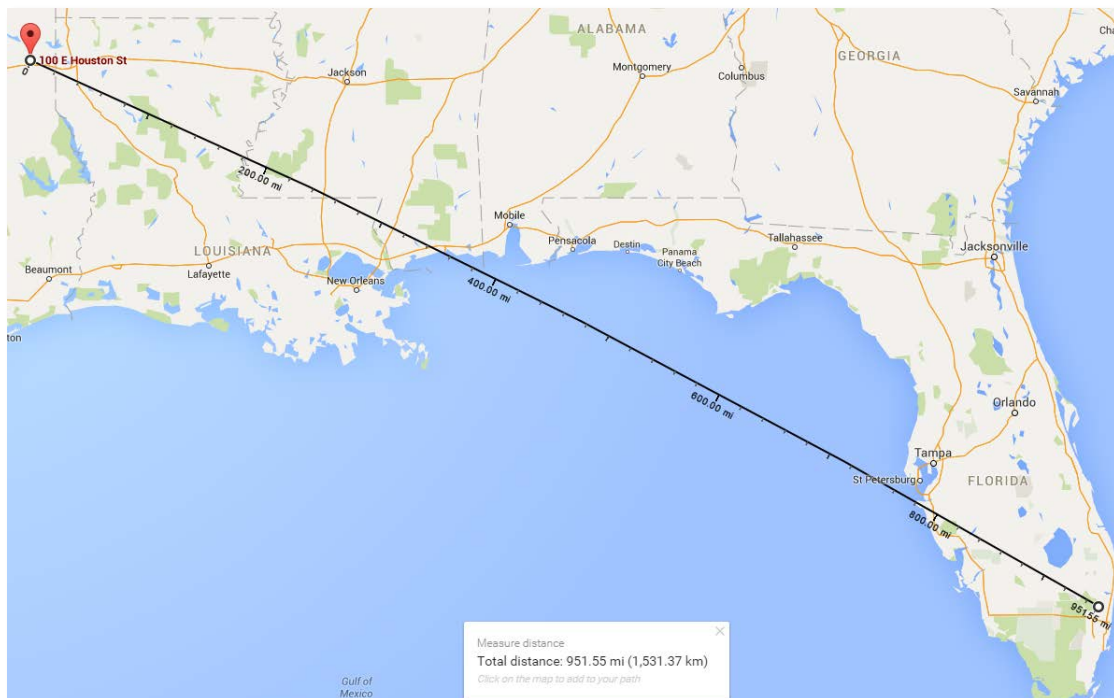
NAV-TV welcomes your questions or comments regarding the Terms:

NAV-TV Corporation 3950 NW 120th Avenue
Coral Springs, Florida 33065

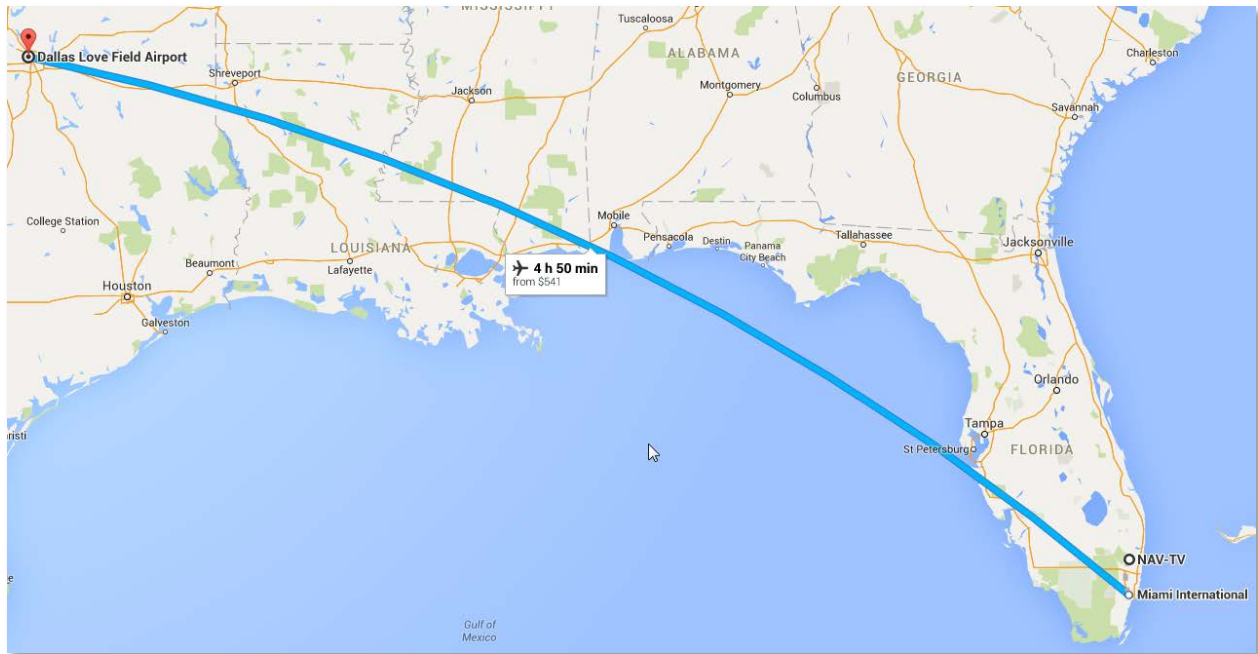
15. On December 7, 2015, I personally performed the following search through www.google.com: “site:https://navtv.com Tyler.” After performing this search I captured the following screenshot:



16. On December 7, 2015, I utilized the Google Maps “Measure distance” tool through <https://maps.google.com> to measure the distance between Coral Springs, Florida, and the Sam B. Hall Jr. Federal Building and U.S. Courthouse located in Marshall, Texas. The “Measure distance” tool showed a distance of approximately 950 miles. After utilizing the “Measure distance” tool, I captured the following screenshot:



17. On December 7, 2015, I performed a Google Maps search utilizing <https://maps.google.com> for flights from Coral Springs, Florida to Dallas Love Field Airport, Dallas, TX. After running this search I captured the following screenshot:

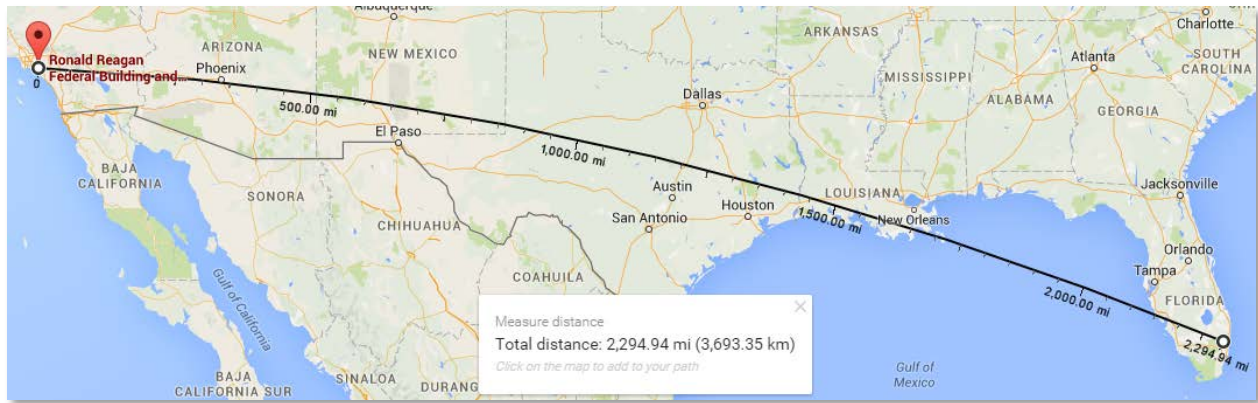


18. On December 7, 2015, I performed a Google Maps search utilizing <https://maps.google.com> for driving directions from Dallas Love Field Airport, Dallas, Texas to the Sam B. Hall Jr. Federal Building and U.S. Courthouse located in Marshall, Texas. After running this search I captured the following screenshot:

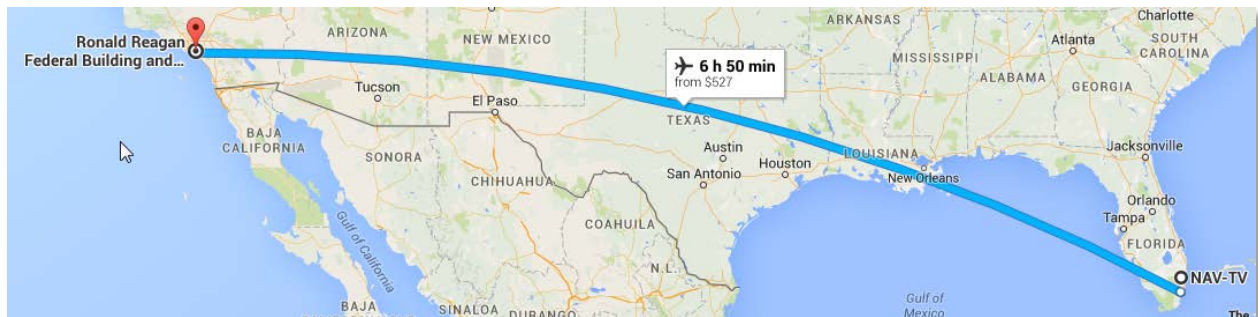


19. On December 7, 2015, I utilized the Google Maps “Measure distance” tool through <https://maps.google.com> to measure the distance between Coral Springs, Florida, and the Ronald Reagan Federal Building and U.S. Courthouse located in Santa Ana, California. The

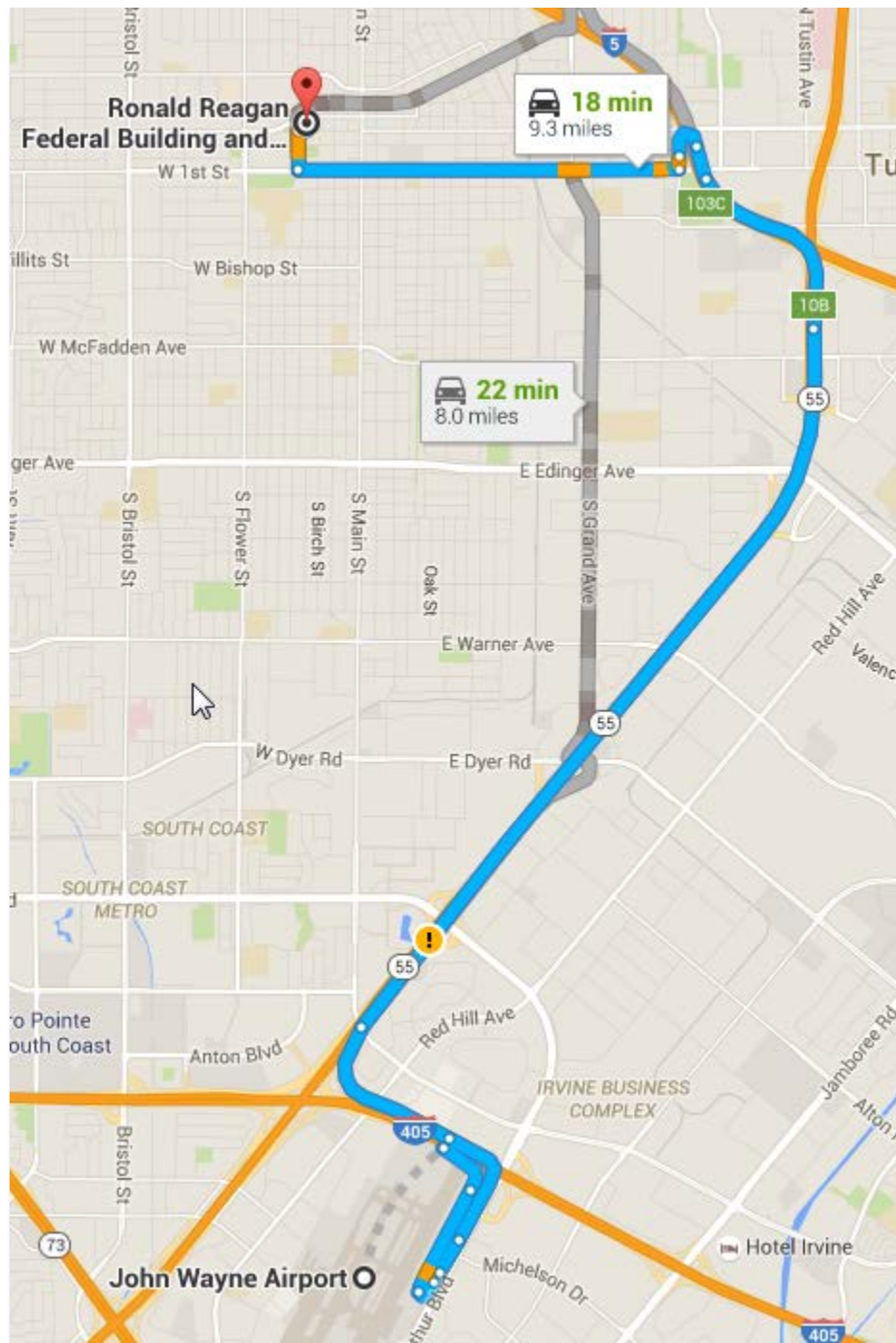
“Measure distance” tool showed a distance of approximately 2300 miles. After utilizing the “Measure distance” tool, I captured the following screenshot:



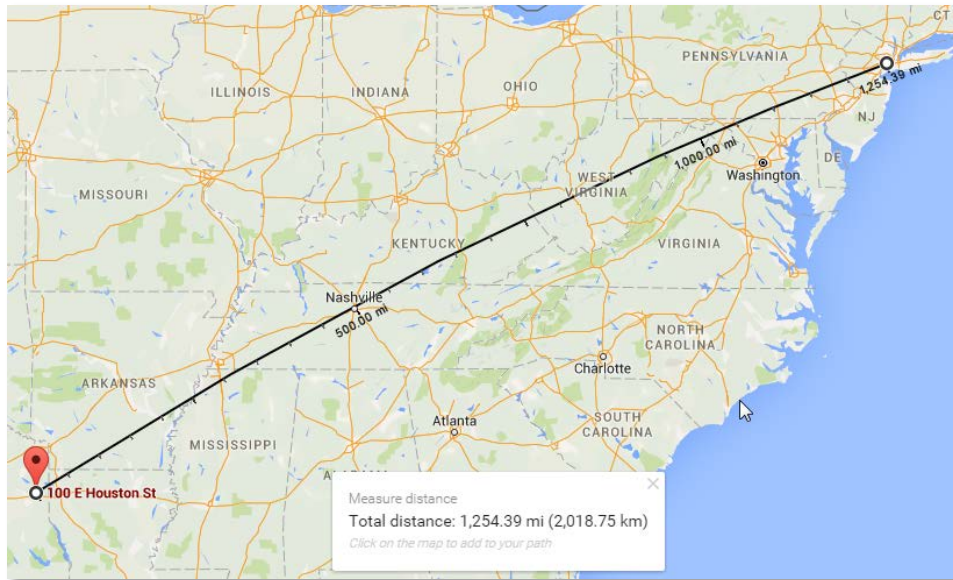
20. On December 7, 2015, I performed a Google Maps search utilizing <https://maps.google.com> for flights from NAV-TV’s Headquarters located in Coral Springs, Florida to the Ronald Reagan Federal Building and U.S. Courthouse located in Santa Ana, California. After running this search I captured the following screenshot:



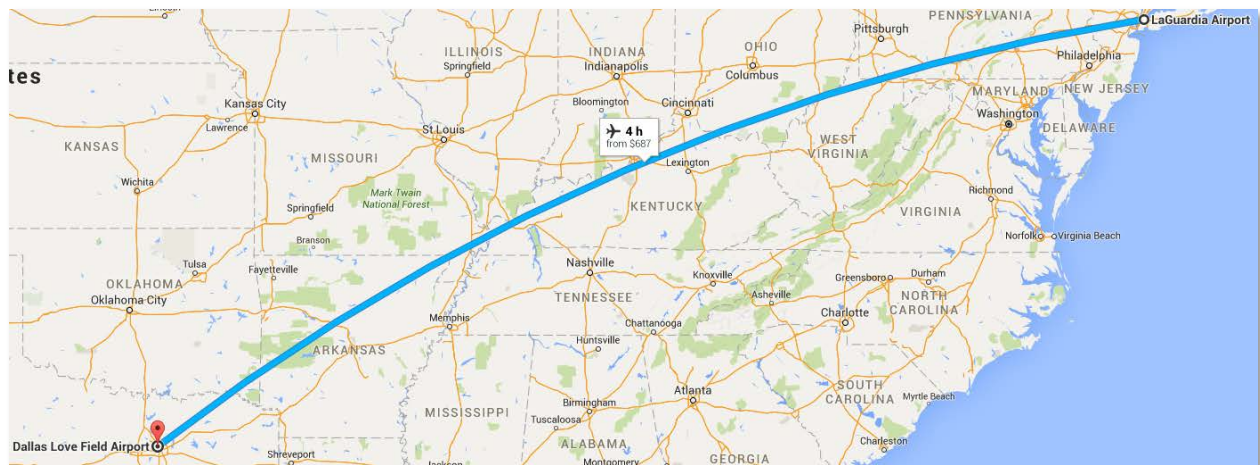
21. On December 7, 2015, I performed a Google Maps search utilizing <https://maps.google.com> for driving directions from John Wayne Airport, Santa Ana, California to the Ronald Reagan Federal Building and U.S. Courthouse located in Santa Ana, California. After running this search I captured the following screenshot:



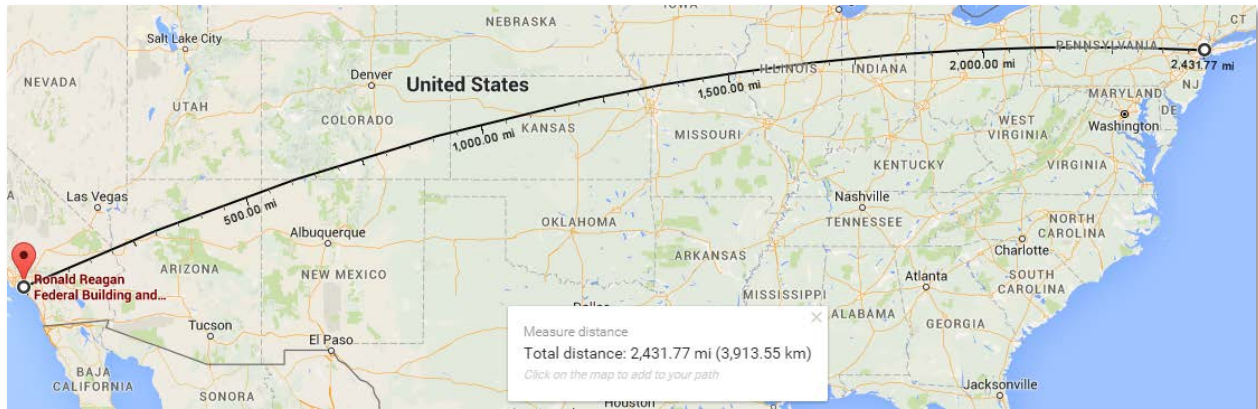
22. On December 7, 2015, I utilized the Google Maps “Measure distance” tool through <https://maps.google.com> to measure the distance between New York, New York, and the Sam B. Hall Jr. Federal Building and U.S. Courthouse located in Marshall, Texas. The “Measure distance” tool showed a distance of approximately 1250 miles. After utilizing the “Measure distance” tool, I captured the following screenshot:



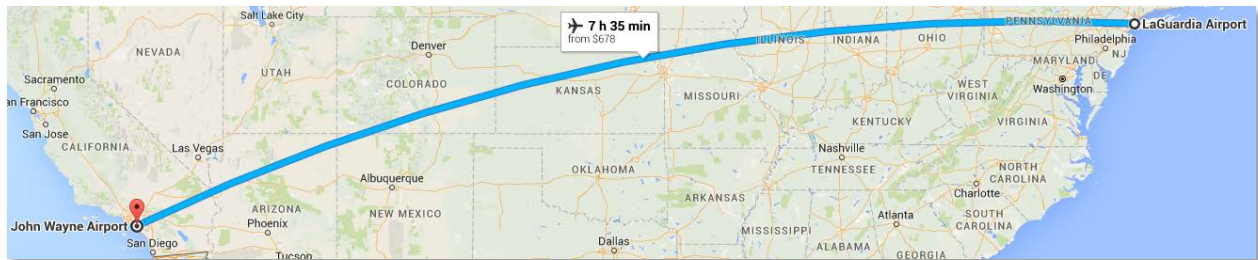
23. On December 7, 2015, I performed a Google Maps search utilizing <https://maps.google.com> for flights from LaGuardia Airport, New York to Dallas Love Field, Dallas, Texas. After running this search I captured the following screenshot:



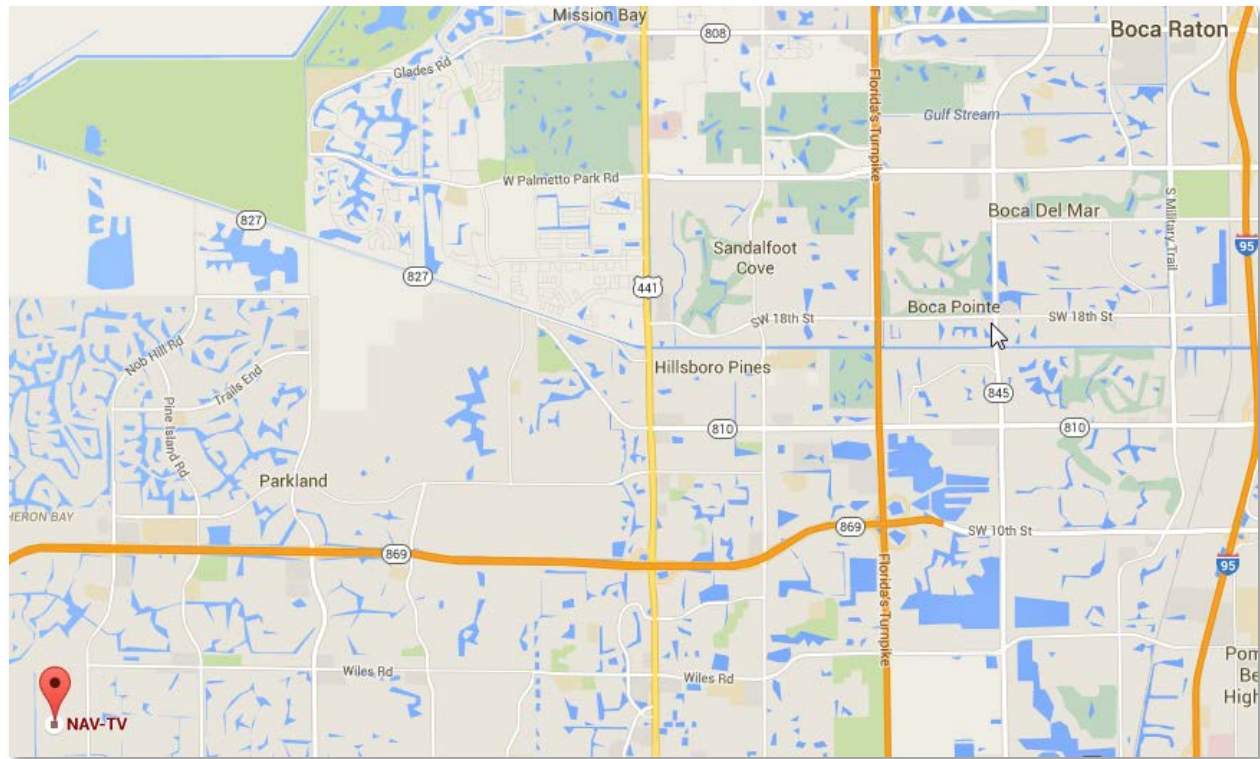
24. On December 7, 2015, I utilized the Google Maps “Measure distance” tool through <https://maps.google.com> to measure the distance between New York, New York, and the Ronald Reagan Federal Building and U.S. Courthouse located in Santa Ana, California. The “Measure distance” tool showed a distance of approximately 2430 miles. After utilizing the “Measure distance” tool, I captured the following screenshot:



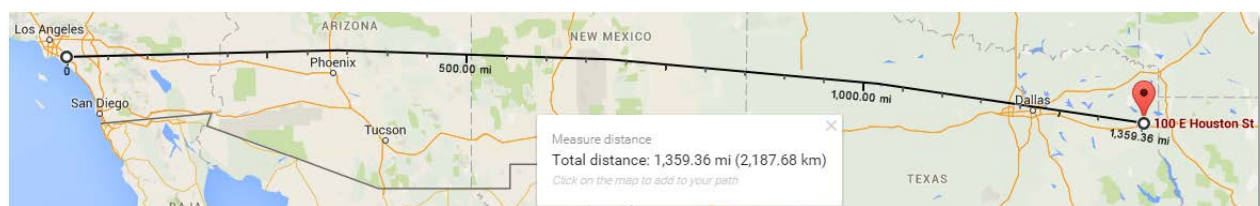
25. On December 7, 2015, I performed a Google Maps search utilizing <https://maps.google.com> for flights from LaGuardia Airport, New York to John Wayne Airport, Santa Ana, California. After running this search I captured the following screenshot:



26. On December 7, 2015, I captured the following screenshot from Google Maps showing the proximity of Boca Raton, Florida, to NAV-TV's Headquarters in Coral Springs, Florida. The distance between the two is approximately twelve miles as the crow flies.



27. On December 7, 2015, I utilized the Google Maps “Measure distance” tool through <https://maps.google.com> to measure the distance between the Ronald Reagan Federal Building and U.S. Courthouse located in Santa Ana, California, and the Sam B. Hall Jr. Federal Building and U.S. Courthouse located in Marshall, Texas. The “Measure distance” tool showed a distance of approximately 1,360 miles. After utilizing the “Measure distance” tool, I captured the following screenshot:



28. On December 7, 2015, I performed a Google Maps search utilizing maps.google.com for flights from Los Angeles International Airport, Los Angeles, California to Dallas Love Field Airport, Dallas, Texas. After running this search I captured the following screenshot:

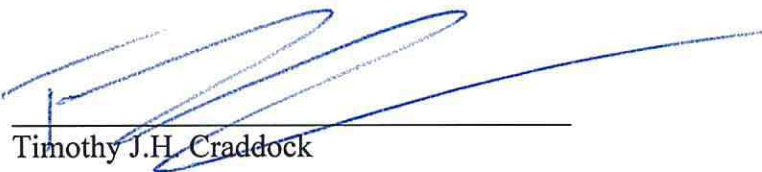


29. Attached as Exhibit 3 is a true and correct copy of an excerpt from the “2015 Patent Litigation Study” published in May 2015 by PWC, obtained at <https://www.pwc.com/us/en/forensic-services/publications/assets/2015-pwc-patent-litigation-study.pdf>.

30. Attached as Exhibit 4 is a true and correct copy of Central District of California Judge Andrew J. Guilford’s Standing Patent Rules, obtained at [http://court.cacd.uscourts.gov/CACD/JudgeReq.nsf/0/5359419014eb2dae882579f5006b0824/\\$FILE/Standing%20Patent%20Rules.pdf](http://court.cacd.uscourts.gov/CACD/JudgeReq.nsf/0/5359419014eb2dae882579f5006b0824/$FILE/Standing%20Patent%20Rules.pdf).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 7, 2015 in Dallas, Texas.


Timothy J.H. Craddock